## REMARKS

In light of the above amendatory matter and remarks to follow, reconsideration and allowance of this application are respectfully requested.

Claims 65, 68-73, 76-80, 83-85, 88-90, 93-95, 98, 99, 182, 184-247, 249, 250, 252-325 and 328-338 are pending in this application. Independent claims 65, 73, 80, 85, 90, 95, 196, 203, 210, 236, 282, 285, 290, 294, 300, 304, 308 and 312 have been amended to recite, in one form or another, that the generated composite image shows the decorative image (or logo image) superimposed on the image of the product. Support for such feature is clearly shown in various figures of the application (e.g., Figs. 3F which shows the logo "PromoCity.com" superimposed on the image of a hat (i.e., the "product") and throughout the detailed description of the application (e.g., page 13, lines 15-16, ".... 'Your Logo' superimposed [on the product] ..."). It is submitted that no new matter has been added.

Claims 65, 68-73, 76-80, 83-85, 88-90, 93-95, 98, 99, 182, 184-247, 249, 250, 252-325 and 328-338 were rejected under 35 U.S.C. 102(e) as being anticipated by Gever et al. ("Gever") (U.S. Patent No. 6,331,861).

First, Gever does not disclose the generation of a composite image that shows the decorative image superimposed on the image of the product. In the Office Action, the Examiner referred to col. 18, line 59 to col. 19, line 3 of Gever for allegedly disclosing generating a composite image of the first image and the second image (Office Action, page 3, lines 8-9). Also, with regard to claim 68, the Examiner asserted that Gever discloses the composite image that includes the second image placed in a default position on the first image, and referred to Figs. 17A and 17B of the drawings of Gever and col. 30, lines 35-49 of Gever for support thereof.

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As shown in the referenced figures of Gever, this cited reference clearly does not generate a composite image that shows the decorative image superimposed on the image of the product. None of the drawings nor is there any disclosure of Gever that entails superimposing of one image, such as a decorative image, on a product. Accordingly, since independent claims 65, 73, 80, 85, 90, 95, 196, 203, 210, 236, 282, 285, 290, 294, 300, 304, 308, 312 and 321 disclose such feature in one form or another, these claims are not anticipated by Gever.

Moreover, additional elements recited throughout the independent claims also are not disclosed in Gever. For example, Gever does not disclose "receiving a first image and a second image at a server from a browser responsive to a user-selection of the first image and the second image, the first image being an image of a product and the second image being a decorative image selected from a group consisting of a logo image and a text image" recited in independent claim 73. Gever describes transmitting computer animation over the Internet, but does not entail a user of a browser providing a first image (i.e., a product) and a second image (i.e., a decorative image) via a browser, then generating the composite image, and then communicating the composite image to the browser. Instead, the discussion on col. 18, line 59 to col. 19, line 3 of Gever, referenced by the Examiner in the discussion of claim 65, does not pertain to communication of the original images via the browser. Independent claims 80, 85, 95, 290, 294, 300, 303, 304, 307, 312, 324, and 335 have similar features that are likewise not disclosed in Gever.

Further, Gever does not disclose "positioning the second image relative to the first image via a Web interface presented on the browser to generate relative positioning information" and then "communicating the relative positioning information to the server via the network " as

recited in dependent claim 69, and similarly recited in claims 84, 89 293, 303, 307, and 338. Rather, in Gever, a user designates such relative position information which then is utilized to create the graphics. The present invention, as recited in these claims, on the other hand, generates the relative positioning information from the positioning of the second image relative to the first image (via a Web interface in claim 69) and then that relative positioning information is communicated to the server via the network, and then the composite image is generated according to such communicated relative positioning information. Gever does not operate in such fashion. It is noted that the Examiner referenced col. 18, line 59 to col. 19, line 3 and col. 21, lines 48-58 of Gever for allegedly disclosing "positioning the .... to generate relative positioning information" and then referenced col. 18, lines 59 to col. 19, line 3 for allegedly disclosing "communicating the ... information to the server" (Office Action, page 3, par. 1.3), but such sections in Gever do not disclose such features recited in the above-identified claims.

Still further, Gever does not disclose a library of "second images," which is distinct from a "library of first images" wherein the first images are images of products and the second images are decorative images, as recited in independent claim 182, and similarly recited in claims 196, 203, 210, 217, 259, 331, and 334. In the Office Action, the Examiner asserted that Gever teaches separate libraries "for storage of the superimposed data" and referred to col. 12, line 62 to col. 13, line 10; col. 18, line 59 to col. 19 line 3, and col. 21, lines 48-58 for support thereof. Gever discloses a "library of images" but does not entail a second library of decorative images in the form of text or logo for incorporation onto a product from the first library. Moreover, Gever does not disclose the feature recited in many of these claims of facilitating a user at the client system to select from the second library a selected second image, wherein the server accesses the selected first and second images based on such selection.

In view of the foregoing, Gever does not anticipate any of the claims of the present application. It is therefore requested that the rejection of claims 65, 68-73, 76-80, 83-85, 88-90, 93-95, 98, 99, 182, 184-247, 249, 250, 252-325 and 328-338 under 35 U.S.C. 102(e) as being anticipated by Gever be withdrawn.

Accordingly, reconsideration and allowance of this application are respectfully requested.

Respectfully submitted,

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